

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref No. __

**ORDER PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL RULE 2004-1
AUTHORIZING EXAMINATIONS**

Upon the motion (the “Motion”)² of the above captioned debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order pursuant to Bankruptcy Code section 105(a), Bankruptcy Rule 2004 and Local Rule 2004-1 (i) authorizing examinations and (ii) directing the production of documents; and this Court having jurisdiction to decide the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 (a)-(b) and 1334(b) and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and upon consideration of the Motion; and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and finding that adequate notice of the Motion having been given; and it appears that no other or further notice need be given; and upon the record of any hearing held to consider the relief requested in the Motion; and this Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

herein; and any objections to the requested relief having been withdrawn, resolved or overruled on the merits; and after due deliberation and sufficient cause appearing therefore,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Debtors are authorized to issue subpoenas to Circle for the production of documents, electronically stored information, or tangible things responsive to the Requests.
3. Circle shall produce documents, electronically stored information, or tangible things responsive to the Requests as soon as practicable and not more than seven (7) days after service of such subpoena unless otherwise agreed by the Debtors and Circle.
4. The Debtors' rights are reserved to request additional discovery and/or examination, including, without limitation, requests based on any information that may be revealed as a result of the discovery authorized pursuant to this Order.
5. This Order is without prejudice to the right of the Debtors to seek further discovery pursuant to Bankruptcy Rule 2004 or otherwise of any other person or entity.
6. The entry of this Order shall not impede the Court from directing relief with respect to the conduct and/or scope of Bankruptcy Rule 2004 examinations authorized herein in the event an examiner is subsequently appointed.
7. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.
8. The terms and conditions of this Order shall be effective immediately and enforceable upon entry.

9. This Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or related to the Motion or the implementation or interpretation of this Order.

Dated: _____, 2023
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge